REMARKS

With the foregoing amendment claims 1, 3, 4, 6-13 and 17-20 are pending in the application. Claims 1, 8, and 13 are independent. No new matter has been added by the amendments. Applicants respectfully request reconsideration of the present application.

I.   First Claim Rejection(s) Under 35 U.S.C. 103

Claims 1-6, 8-11 and 13-19 stand rejected under 35 U.S.C. 103 as being unpatentable over Hamamura (US 6,567,120) in view of Takahashi (US 4,253,753). Applicants respectfully traverse.

A. Claim 1

Claim 1, as amended, is not obvious over Hamamura in view of Takahashi, because neither Hamamura nor Takahashi, considered alone or in combination, teach or suggest all of the features of claim 1. For example, at the least, neither Hamamura nor Takahashi teach or suggest "a memory that stores a plurality of digital images <u>and a plurality of different elapsed time values,</u> wherein each said different elapsed time value is associated with a digital image," as is recited in claim 1 (emphasis added).

Takahashi discloses memory (see latch circuits 7 and 16) that is capable of storing only a <u>single</u> elapsed time value at any given point in time. The elapsed time value stored in circuit 7 is identical to the elapsed time value stored in circuit 16. Thus, Takahashi does not disclose a memory that stores a plurality of different elapsed time values.

Hamamura discloses a camera with a memory, but the memory does not store any elapsed time values, let alone a plurality of different elapsed time values. With respect to Hamamura, Applicant respectfully submits that the Examiner is confusing an "instantaneous time value" with an "elapsed time value." Hamamura discloses storing specific, instantaneous time values, but does not teach or suggest storing elapsed time values. An instantaneous time value is a value that represents a single, specific point in time. For example, the value 10:15 am is a specific, instantaneous time value. Hamamura discloses nothing more than storing instantaneous time values. This is clear from the specification of Hamamura. Hamamura states, "the timer 45 has an internal time measurement circuit and

outputs data corresponding to the <u>current time</u> to the CPU 39." Col 7, ll. 3-5. Hamamura also states, "based on the [instantaneous] date and time supplied from timer 45, the CPU 39 records the [instantaneous] photographic date and time information into the photographic picture image recording area ...." Col. 7, ll. 55-58. Simply put, nowhere does Hamamura disclose storing a single elapsed time value, let alone a plurality of elapsed time values. Thus, neither Hamamura nor Takahashi, considered alone or in combination, teach or suggest all of the features of claim 1.

Moreover, neither Hamamura nor Takahashi teach or suggest "at least one input device <u>enabling a user to select at least one of the plurality of elapsed time values</u> stored in said memory," as is also recited in claim 1 (emphasis added).

Hamamura discloses an input device (see e.g., touch tablet 6A). But, Hamamura does not teach or suggest that the input device disclosed in Hamamura enables a user to <u>select</u> at least one of a plurality of elapsed time values that are stored in a memory. While it is true that a user is able to use the input device to input an elapsed time value, inputting a value is not the same as selecting a stored value. Thus, Hamamura does not teach or suggest "at least one input device <u>enabling a user to select at least one of the plurality of elapsed time values</u> stored in said memory."

Takahashi does not make up for the deficient teachings of Hamamura. Takahashi does not disclose an input device that enables a user to select one of a plurality of elapsed time values. The only input disclosed in Takahashi is an input that enables the user to manually start and stop a timer (see input 12 in figure 1).

For at least the above reasons, claim 1 is patentable over Hamamura in view of Takahashi. Applicant, therefore, respectfully requests that claim 1 be indicated as allowable.

B. <u>Claims 3 and 4</u>

Claims 3 and 4 depend from claim 1. Thus, claims 3 and 4 are patentable for at least the same reason give above with respect to claim 1.

C. Claim 8

Claim 8, as amended, is not obvious over Hamamura in view of Takahashi, because neither Hamamura nor Takahashi, considered alone or in combination, teach or suggest all of the features of claim 8. For example, at the least, neither Hamamura nor Takahashi teach or suggest "an elapsed time counter that is reset in response to a first image capture," as is recited in claim 8.

The Examiner contends that Hamamura does not disclose "that the elapsed time counter [is] capable of being reset upon a first image capture." Applicant agrees with the Examiner. But the Examiner contends that Takahashi makes up for the deficient teachings of Hamamura. The Applicant respectfully disagrees.

Takahashi discloses an elapsed time counter (see time counter 6 in figure 1). However, there is no teaching anywhere in Takahashi that the time counter 6 is reset "in response to a first image capture," as is required by claim 8 as amended. Takahashi teaches that time counter 6 is capable of being reset only in response to either (1) a signal applied to reset input 13 or (2) a signal applied to manual start/stop input 12. Thus, the only way to reset the time counter 6 is to either apply a signal to input 13 or apply a signal to input 12. Importantly, nowhere does Takahashi suggest that a signal is applied to either input 12 or input 13 "in response to a first image capture." In fact, Takahashi suggest that a signal is applied to input 12 or 13 only in response to a button depressing or activation of a reset switch. See e.g., col. 2, ll. 20-23 ("The input terminal 12 is connected to a depression button (not shown) for manual operation ...."); col. 2, ll. 46-48 ("To the terminal 13 is applied a signal, for example, by depressing a button (not shown)"); and col. 3, ll. 54-56 ("the reset switch is manually operated, so that a reset signal is applied from the terminal 13 to the multivibrator 2 ...."). In short, there is no teaching anywhere in Takahashi that the time counter 6 is reset "in response to a first image capture," as is required by claim 8.

For at least the above reasons, claim 8 is patentable over Hamamura in view of Takahashi. Applicant, therefore, respectfully requests that claim 8 be indicated as allowable.

D. <u>Claims 9-12</u>

Claims 9-12 depend from claim 8. Thus, claims 9-12 are patentable for at least the same reason give above with respect to claim 8.

E. <u>Claim 13</u>

Claim 13, as amended, is not obvious over Hamamura in view of Takahashi, because neither Hamamura nor Takahashi, considered alone or in combination, teach or suggest all of the features of claim 13. For example, at the least, neither Hamamura nor Takahashi teach or suggest "generating, in a counter of said image capturing device, an elapsed time value representing an elapsed time between an event that causes the image capturing device to capture a first image and an event that causes the image capturing device to capture a second image ..., <u>wherein the step of generating the elapsed time value comprises: resetting said counter in response to the event that causes said image capturing device to capture the first image</u> ...," as is recited in claim 13 as amended.

As discussed above with respect to claim 8, Hamamura does not teach or suggest an elapsed time counter, let alone resetting an elapsed time counter.

Additionally, as discussed above with respect to claim 8, Takahashi discloses a counter that can be reset by applying a reset signal to either terminal 12 or terminal 13. However, nowhere does Takahashi suggest that the reset signal is applied to either terminal 12 or 13 "in response to an event that causes the image capturing device to capture [an] image," as is required by claim 13. In fact, Takahashi suggests only that the reset signal is applied to terminal 12 or 13 in response to a user manually depressing a button or activating switch. Significantly, nowhere does Takahashi teach or suggest that depressing said button or activating said switch is an event that causes the device to capture an image. Thus, Takahashi does not teach or suggest "<u>resetting said counter in response to the event that causes said image capturing device to capture the first image.</u>"

Thus, neither Hamamura nor Takahashi, considered alone or in combination teach or suggest all of the features of claim 13. For at least the above reasons, claim 8 is patentable over Hamamura in view of Takahashi. Applicant, therefore, respectfully requests that claim 8 be indicated as allowable.

F. Claims 16-19

Claims 16-19 depend from claim 13. Thus, claims 16-19 are patentable for at least the same reason give above with respect to claim 13.

II. Second Claim Rejection(s) Under 35 U.S.C. 103

Claims 7, 12, and 20 stand rejected under 35 U.S.C. 103 as being unpatentable over Hamamura, Takahashi and Bates (US 2002/0080256). Applicant respectfully traverses. Claims 7, 12, and 20 depend from claims 1, 8 and 13, respectively, and are patentable for at least the same reasons given above with respect to claims 1, 8 and 13.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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